



NOTIFICATION FORM

FOR DATA PROCESSING OPERATIONS

Date of registration: 28.6.2011

Register No: FM6

1. Name of the data processing operation

Key register

2. Data Controller

Programme or Group: OSE4 / Facilities

Function: Head of Programme

Contact person: Sigfús Bjarnason;
Facilities: facilities_services@eea.europa.eu
Logistics@eea.europa.eu

3. Description of the processing operation

3.1. Area of activity in which the processing is carried out

Keys to staff (and in some cases external staff) are handed out based on the need in terms of function and tasks to be carried out. Signature on paper is required by the staff member and there is paper dossier for this. Possession of a key is also stored in a database.

3.2. Modalities for the processing operation

☒ Manual processing
(please describe) Signature for receiving the key is kept on paper.

☒ Automated processing
(please describe) Registered in Logistics services

3.3. Are the Personal data processed by an entity external to EEA ('processor')?

☐ Yes

☒ No

4. Lawfulness and purpose of the processing
4.1. Legal basis
○ Headquarter agreement signed between the EEA and the Government of Denmark on 10 May 1995, in particular Article 5. ○ EEA's security policy
4.2. Grounds for lawfulness
The data subject has unambiguously given his or her consent (Article 5(d) of Regulation (EC) No 45/2001)
4.3. Purpose of the processing
To keep track of the keys issued to staff and other categories of persons

5. Features of the processing operation
5.1. Categories of data subjects concerned
EEA staff and in limited cases external contractors (IT consultants, Security guards and Facility management)
5.2. Categories of data
☒ Staff member's name and contact details (email, phone, fax, address and title)

6. Retention practice of personal data
The personal data are retained in the register and the database until the key is returned or until the contract of the data subject concerned ends. No data is kept for historical or statistical purposes.

7. Personal data processed for historical, statistical or scientific purposes (Please tick whichever is applicable or indicate 'n/a' (not applicable))		
Purpose	Categories of data	Storage media
☐ Historical	Not applicable	☐ Anonymous ☐ Encrypted
☐ Statistical	Not applicable	☐ Anonymous ☐ Encrypted
☐ Scientific	Not applicable	☐ Anonymous ☐ Encrypted

8. Recipients or categories of recipients to whom the data might be disclosed

Based on needs, e.g. sensitive information in staff member's office, IT server room, Facility management.

9. Proposed transfer of personal data to third countries or international organisations

☐ Yes

☒ No transfer of personal data to third countries or national organisation

10. Information given to the data subjects as described in Articles 11 & 12 of the Regulation (EC) No 45/2001)

The form to be signed by the data subject before issuing the key contains the following paragraph on data protection:

"Processing your request for an office key will involve the recording and processing of personal data (such as your name, your business contact details and function). Such data will be processed pursuant to Regulation (EC) No 45/2001 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data. Unless indicated otherwise, your personal data requested are required to keep track of the office keys issued and will be processed solely for that purpose by the EEA. If you have any queries concerning the processing of your personal data, you may address them to the facilities services. You have the right of recourse at any time to the European Data Protection Supervisor for matters relating to the processing of your personal data".

11. Procedures to enable data subjects to exercise their rights (as indicated in Articles 13 to 19 of the Regulation (EC) No 45/2001, i.e. access, rectification, blocking, erasure, objection)

The data subjects write themselves their personal data in the register and may therefore directly rectify immediately any inaccuracy concerning the data required.

12. Time limits for blocking and erasure of the different categories of personal data

Categories of data	Blocking	Erasure
Not applicable	Not applicable	Not applicable

